

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION**

**IN RE:**

**KENNETH MICHAEL WILLIAMS,  
TONYA ROBINSON WILLIAMS,**

**CASE NO. 14-05481-5-DMW  
CHAPTER 13**

**DEBTORS**


**DEBTORS' MOTION TO TRANSFER PROPERTY**

NOW COME the debtors, by and through their undersigned counsel, pursuant to E.D.N.C. LBR 4002-1(g)(4), and files this Motion to Transfer Property and as such shows the court as follows:

1. The debtors filed this chapter 13 case on September 19, 2014.
2. The female debtor owns, along with her brother Anthony L. Robinson, real property located at 117 Courthouse Drive, Elizabethtown, NC 28337 (hereinafter "Property") which has a scheduled valued of \$80,000.00 subject to a mortgage in the amount of \$37,359.16. The female debtor only has bare legal title to the Property as her brother Anthony L. Robinson has made all the payments related to the Property. The female debtor is only connected to the Property because she was helpful in obtaining mortgage financing.
3. The female debtor's brother Anthony L. Robinson is seeking to have the Property owned solely in his name. The transaction will not be arms length. There is no consideration. The debtors are related to the prospective transferee Anthony L. Robinson.

WHEREFORE, debtors pray the Court that they be permitted to convey their interest in the Property to Anthony L. Robinson and for such other and further relief as the court deems just and proper.

Dated: 12/12/14

  
/s/ Travis Sasser  
Travis Sasser  
Attorney for debtors  
State Bar No. 26707  
2000 Regency Parkway  
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Cary, NC 27518  
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**NOTICE OF MOTION**

NOTICE IS HEREBY GIVEN that a MOTION has been filed by the debtors. A copy of the motion accompanies this notice

TAKE NOTICE FURTHER that pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of North Carolina, you have twenty one (21) days from the date of this Notice of Motion to file a responsive pleading to the attached Motion. You must file your response with the Clerk, United States Bankruptcy Court, Post Office Box 791, Raleigh, NC 27602 with a copy to the undersigned. Any such responsive pleading must contain a request for a hearing if, indeed, you wish to be heard by the Court. Unless a hearing is specifically requested in a responsive pleading, the attached Motion may be determined and final Orders entered by the court without a hearing.

Dated: 12/12/14

  
/s/ Travis Sasser  
Travis Sasser  
Attorney for debtors  
State Bar No. 26707  
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### CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Motion was served on the entities listed below at their last known address with sufficient postage thereon, or, if such interested party is an electronic filing user, by serving such interested party, electronic transmission, pursuant to Local Rule 5005-4(9)(b).

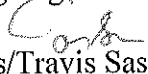
Chapter 13 Trustee  
*Served Electronically*

First Citizens Bank & Trust Company  
Attn: Roz Johnson Duty  
PO Box 25187  
Raleigh, NC 27611-5187  
*Via certified mail, return receipt requested*

*ALL ADDRESSES ON THE DEBTORS' ATTACHED MAILING MATRIX*

I certify under penalty of perjury that the foregoing is true and correct.

Dated: 12/12/14

  
\_\_\_\_\_  
/s/Travis Sasser  
Travis Sasser  
Attorney for debtors  
State Bar No. 26707  
2000 Regency Parkway  
Suite 230  
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Tel: 919.319.7400  
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tsasser@carybankruptcy.com

Recovery Management Systems Corporation  
25 SE 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

ADT Security Services  
Attn: Managing Agent  
14200 E. Exposition Ave  
Aurora, CO 80012-2540

Ally Financial  
Attn: Managing Agent  
PO Box 130424  
Roseville, MN 55113-0004

Ally Financial serviced by Ally Servicing LL  
PO Box 130424  
Roseville, MN 55113-0004

Citizens State Bank  
Attn: Managing agent  
315 Columbus Avenue NW  
Vernon, AL 35592-5760

Comenity Bank/Coldwater Creek  
Attn: Managing Agent/Bankruptcy  
4590 East Broad Street  
Columbus, OH 43213-1301

Direct Loan Servicing Center  
501 Bleeker Street  
Post Office Box 4399  
Utica, NY 13504-4399

FSG Bank National Association  
Service Finance Co., LLC  
555 S Federal Hwy #220  
Boca Taton, FL 33432-6033

First Citizens Bank  
Attn: Managing Agent  
PO Box 27131  
Raleigh, NC 27611-7131

(p)FIRST CITIZENS BANK TRUST COMPANY  
P O BOX 25187  
RALEIGH NC 27611-5187

Internal Revenue Service  
Centralized Insolvency Operations  
P. O. Box 7346  
Philadelphia, PA 19101-7346

NC Department of Revenue  
Attn: Angela C. Fountain, BK MGR.  
Post Office Box 1168  
Raleigh, NC 27602-1168

NEC Financial Services, Inc.  
250 Pehle Avenue  
Suite 704  
Saddle Brook, NJ 07663-5888

National Auto Finance Co.  
Attn: Managing Agent  
Post Office Box 2365  
Memphis, TN 38101-2365

National Auto Finance Company  
PO Box 130424  
Roseville, MN 55113-0004

Quantum3 Group LLC as agent for  
Comenity Bank  
PO Box 788  
Kirkland, WA 98083-0788

Recovery Management Systems Corporation  
25 S.E. 2nd Avenue, Suite 1120  
Miami, FL 33131-1605

Service Financial Company, LLC  
Attn: Managing agent  
555 South Federal Highway Suite 200  
Boca Raton, FL 33432-6033

Snap Advances  
Attn: Managing agent  
123 Grove Avenue, Suite 120  
Cedarhurst, NY 11516-2302

SunTrust Bank  
Attn. Support Services  
P.O. Box 85092  
Richmond, VA 23286-0001

Suntrust Bank  
Attn: Managing Officer  
211 Perimeter Center Parkway  
Atlanta, GA 30346-1307

Suntrust Bank  
VA-TOC-7530  
1030 Wilmer Avenue  
Richmond, VA 23227-2403

(p)TOYOTA MOTOR CREDIT CORPORATION  
PO BOX 8026  
CEDAR RAPIDS IA 52408-8026

Toyota Motor Credit Corporation  
c o Becket and Lee LLP  
POB 3001  
Malvern, PA 19355-0701

Toyota Motor Credit Corporation (TMCC)  
PO BOX 8026  
Cedar Rapids, Iowa 52408-8026

UNC Health Care  
Attn: Managing Agent  
211 Friday Center Drive, Ste2015  
Chapel Hill, NC 27517-9499

Wake Med  
Patient Financial Services  
Post Office Box 29516  
Raleigh, NC 27626-0516

Wells Fargo Bank NA  
PO Box 10438  
Des Moines IA 50306-0438

Wells Fargo Bank, N.A.  
P.O. Box 19657  
Irvine, CA 92623-9657

Wells Fargo Card Services  
Attn: Managing Agent  
PO Box 9210  
Des Moines, IA 50306-9210

Wells Fargo Dealer Services  
Attn: Managing Agent/Bankruptcy  
PO Box 168048  
Irving, TX 75016-8048

Wells Fargo Home Mortgage  
BK Cash Management MAC#X2302-04C  
One Home Campus  
Des Moines, IA 50328-0001

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Apex, NC 27502-1198

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PO Box 2105  
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